

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DELCINE THOMPSON)	
)	
Plaintiff,)	
)	
v.)	No. 08 C 1222
)	
ILLINOIS DEPARTMENT OF)	Honorable Joan H. Lefkow
CORRECTIONS and)	
EDWARD HUNTLEY, individually and)	Magistrate Judge Maria Valdez
In his capacity as Chief Legal Counsel of)	
The Illinois Department of Corrections,)	
)	
Defendants.)	

MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER

NOW COME Defendants, the ILLINOIS DEPARTMENT OF CORRECTIONS, (“IDOC”), and EDWARD HUNTLEY, individually and in his capacity as Chief Legal Counsel, by their attorney, LISA MADIGAN, Attorney General of Illinois, and hereby move this Honorable Court to grant their Motion for Entry of Agreed Protective Order. In support of this motion, Defendants state as follows:

1. Plaintiff has requested the production of certain documents from IDOC pertaining to the personal employment records of current or former IDOC employees.
2. IDOC has requested confidential information and documents from Plaintiff pertaining to her medical records and income tax returns.
3. Due to the confidential information contained in the documents requested from both parties, counsel for Defendants and Plaintiff agree that this information must be protected from unnecessary disclosure.

4. Defendants respectfully request that the Court grant their Motion for Entry of Agreed Protective Order. A true and correct copy of the proposed Agreed Protective Order is attached hereto as **Exhibit A** and a copy of the Order in Word Perfect format was sent to the court, pursuant to its Standing Order, via electronic mail.

5. Counsel for Defendants contacted counsel for Plaintiff, who agreed to the attached Protective Order.

WHEREFORE, for the foregoing reasons, Defendants respectfully request that this Court grant their Motion for Entry of Agreed Protective Order and for such other relief as the Court deems just and proper.

Respectfully Submitted,

**ILLINOIS DEPARTMENT OF
CORRECTIONS and EDWARD HUNTLEY,
Individually and in his capacity as Chief Legal
Counsel,
Defendants**

LISA MADIGAN
Attorney General of Illinois

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